

## Rumrill, Nancy

---

**From:** Jennifer Saran <JenniferSaran@florencecopper.com>  
**Sent:** Wednesday, August 25, 2021 9:53 AM  
**To:** Rumrill, Nancy  
**Cc:** Brent Berg; MNicholls@haleyaldrich.com; greenslade.maribeth@azdeq.gov  
**Subject:** Revised Proposed Annular Conductivity Device Demonstration  
**Attachments:** ATT00001.txt

Good morning,

Please see below for a summary of Florence Copper's revised proposed annular conductivity device (ACD) demonstration contingency actions, with supporting points. If needed, could EPA's contractor join us for Thursday's call to discuss this revised proposal, and work through any additional questions or recommendations?

- 1. Conduct trend analysis for each of the early warning ACDs to identify the greatest decrease in resistivity under baseline conditions. This trend analysis will be used to identify naturally occurring extremes and data migration trends under baseline conditions. Compare the baseline data trends to trend(s) observed at the sacrificial ACD(s) installed in the injection zone to identify the magnitude of signal departure within the injection zone.**
  - a. Note: Comparison of the extreme baseline resistivity values to the sacrificial ACD resistivity values will provide a basis for evaluation of ACD performance, and information to troubleshoot or refine the system.
- 2. Install and begin monitoring 12 ACD Test contingency wells installed within the UBFU (the USDW overlying the ISCR wellfield). Eight (8) of the wells will be evenly spaced within the footprint of the ISCR wellfield, and 4 of the wells will be placed in the UBFU above locations where known faults are projected to intersect the top of bedrock. These 12 wells will be added to the supplemental monitoring wells included in the groundwater monitoring program to detect potential excursions into the USDW.**
  - a. Note: These 12 additional wells will be added to the 16 supplemental wells which include USDW monitoring wells, fault monitoring wells, and ACD test wells. This will result in a total of 28 supplemental monitoring wells that will be used to monitoring for potential excursions into the USDW and along the mapped faults. This distribution of monitoring wells includes intensive monitoring in the USDW down gradient and directly above the ISCR wellfield, and in the USDW above mapped faults at the edge of the wellfield. This monitoring will be conducted in conjunction with monitoring at 32 POC wells (29 of which are located at the edge of the wellfield).
  - b. Note: Based on USEPA guidance provided in *Unified Guidance Document: Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities March 2009, EPA 530/R-09-007*, with 12 wells constructed in the overlying USDW (UBFU), each sample event provides sufficient data to support statistical analyses characterizing conditions, or changes in conditions, within the overlying USDW.
  - c. Note: Depending on the results of the ACD demonstration, the combined monitoring program will include a total of 57 monitoring wells to monitor the USDW above, and at, the edge of the wellfield to detect potential excursions into the USDW.
  - d. Note: The APP limits the number of active ISCR wells to 462. The total number of monitoring wells (57) positioned to monitor the USDW above and at the edge of the ISCR wellfield is greater than 10 percent of the permitted number of active ISCR wells.
- 3. Install fiber optic temperature sensors at the base of the UBFU on the 12 ACD Test contingency wells. The temperature sensors will be monitored at the same frequency planned for the ACDs.**

Thanks,  
Jennifer

**Jennifer Saran** Environmental, Health and Safety Manager



Florence Copper Inc.  
1575 W. Hunt Highway Florence AZ USA 85132  
C 480-532-0108 T 520-316-3707 F 520-374-3999  
E [jennifersaran@florencecopper.com](mailto:jennifersaran@florencecopper.com) Web [florencecopper.com](http://florencecopper.com)

**SAFETY – Own it. Practice it. Share it.**  
**#FLORENCECOPPERSTRONG**

---

"Notice Regarding Transmission

This message is intended only for the person(s) to whom it is addressed and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this communication is prohibited. Please notify us of the error in communication by telephone (778-373-4533) or by return e-mail and destroy all copies of this communication. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of Taseko Mines Limited or any affiliated or associated company. The recipient should check this email and any attachments for the presence of viruses. Neither Taseko Mines Limited nor any affiliated or associated company accepts any liability for any damage caused by any virus transmitted by this email. Thank you."